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## CALIFORNIA PUBLIC-SAFETY RADIO ASSOCIATION, INC.

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A CHAPTER OF THE ASSOCIATION OF PUBLIC-SAFETY COMMUNICATIONS OFFICIALS-INT'L., INC.



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October 17, 1996

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Federal Communications Commission  
1911 M Street, N.W.  
Washington, D.C. 20554

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Dear Gentlemen:

DOCKET FILE COPY ORIGINAL

Attached is an original and nine copies of the Comments of the California Public-Safety Radio Association in WT Docket 96-86.

Please 'Date Stamp' and return one copy. Enclosed is a self-addressed envelope for your use. Thank you.

Very truly yours,

Travis Williams, Chair  
Regulatory Committee

TW:cr

Attachment

(CPRAFile)

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**BEFORE THE**

**Federal Communications Commission**

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**WASHINGTON, D.C. 20554**

In the Matter of

The Development of Operational,  
Technical, and Spectrum  
Requirements for Meeting  
Federal, State and Local Public  
Safety Agency Communication  
Requirements Through the  
Year 2010

WT Docket No. 96-86

To: The Commission

**COMMENTS OF  
THE CALIFORNIA PUBLIC-SAFETY RADIO ASSOCIATION  
(A CHAPTER OF THE ASSOCIATION OF PUBLIC-SAFETY  
COMMUNICATIONS OFFICIALS - INTERNATIONAL)**

The California Public-Safety Radio Association (CPRA), hereby submits Comments in response to the Notice of Proposed Rulemaking in WT Docket No. 96-86.

CPRA, founded more than sixty years ago, has a long and proud history of representing the interests of law enforcement, fire suppression, and emergency medical service agencies serving the eleven counties which make up one of the Nation's most diverse and densely populated areas. It is a region which has experienced tremendous growth in population and since the end of World War II, and is home to many thousands of manufacturers, equipment suppliers, and service providers supporting industries of every type around the world. Located in Southern California are some of

the most respected public safety agencies in the world; agencies which regularly contribute specialized teams and equipment to help their fellow man, whether it be in hurricane recovery, international search and rescue, or the war against terrorism. In turn, our agencies have often found it necessary to enlist the aid of outside assistance in such diverse events as earthquake response, massive wildfires, and in restoring peace following civil disorder. CPRA is truly an organization committed to cooperation, and welcomes this opportunity to endorse the Comments of its parent organization - the Association of Public-Safety Communications Officials - International - in supporting many of the findings and recommendations of the Public Safety Wireless Advisory Committee.

## **1. Interoperability**

In the densely populated regions of Southern California, with their patchwork of local governments, interoperability is a year-round requirement which must be endorsed and addressed by every public safety agency. The need for instant, reliable, wireless communications between representatives of two or more agencies is a constant requirement; one which is used many times each day by each agency in support of every conceivable type and degree of emergency operation. Our member agencies have operations on every band available to public safety, and know all too well the challenges faced in achieving interoperability given the existing channel allocations. Spectrum set aside exclusively for interoperability must not only be adequate to meet present and future needs, but must also offer options that will enable providers to use what works best and meets the unique requirements of their respective jurisdictions.

## **2. System Requirements**

Our Chapter members represent every level of government and every type of emergency service provider. We represent systems serving jurisdictions as small as one square mile, and others larger than many states. System requirements differ greatly under many circumstances, such as

physical size, geography, and population density. It is the responsibility of local government to determine what type of communications systems will address and satisfy their specific needs at affordable costs. As a result, we have consolidated, coordinated communications systems serving dozens of individual departments, as well as stand-alone, single agency systems. We deem it important that decisions on consolidation continue to rest with local government, although in the interest of efficient spectrum utilization CPRA joins with APCO - International in supporting the development of well-planned, joint communications operations.

### **3. Technology**

CPRA recognizes the incompatibility of the various emerging digital transmission technologies (TDMA, CDMA, etc.), but also sees the tremendous potential each offers in relative efficiency. We predict that we will see public safety applications emerge within each, and must evaluate the potential incompatibility that may result. To a great extent successful deployment of these technologies will be market-driven, and local agencies should lend significant weight to evaluating the impact of potential incompatibility as part of their decision-making processes. CPRA encourages equipment providers to place a very high priority on building the electronic "bridges" that we believe will help overcome these incompatibility issues.

### **4. Spectrum**

The PSWAC Final Report recommends both short-term and long-term allocations, as follows:

- 2.5 MHz immediately, to satisfy interoperability needs
- 25 MHz by the year 2000
- 70 MHz by the year 2010
- 161 MHz of additional microwave spectrum

These requirements are very well documented in the Spectrum Sub-Committee Report, and could involve spectrum reallocated from UHF-TV channels 60-69 under MM Docket No. 87-268, VHF television channels, or little-used Department of Defense spectrum.

## **5. Transition**

If we are to make a successful transition to new spectrum previously unused by public safety, it is highly probable that we will make ever-increasing use of commercial services to meet our growing needs. Just as public safety has embraced the technologies of cellular telephony, paging, and mobile data, it is a foregone conclusion that we will also welcome Personal Communications Systems (PCS), wireless Internet access, and other products which lend themselves to our needs. But it is imperative that the day-to-day, mission critical operations remain under the protective umbrella of local government. This provides the best, long-term assurance that systems are designed with the end users needs foremost in importance, with the singular goal of meeting the expectations of our citizens and their protectors. If there will ever be a time when this responsibility could be assumed by the private sector, we can not envision it from our present vantagepoint, and certainly not within the range of this proceeding.

## **6. Competition**

CPRA embraces the concept and benefits derived from open competition among equipment providers, and has long participated in efforts to maintain and enhance a level playing field for those who wish to enter the public safety communications market. We have proceeded with great caution when faced with proprietary systems, and will continue to do so. APCO Projects 16 and 25 represent the desire of member agencies to support standards which can be met and improved upon by any manufacturer who desires to do so, and a growing number are doing just that. This does not represent an "end result," but rather an ongoing process designed to provide platforms which will

support migration between standards and emerging technologies. We recognize that public safety agencies receive substantial benefit from an expanding choice of goods and suppliers, but we also must emphasize that compatibility and interoperability requirements must be satisfied if we are to work together in providing safe communities and earning public trust.

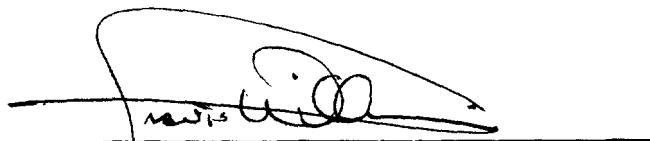
### **Conclusion**

The members of the California Public-Safety Radio Association and APCO-International have demonstrated the high degree of interagency cooperation and communication which are illustrative of our Nation's public safety agencies. We recognize the significance and importance of this proceeding, and are proud that many of our members contributed significantly to the PSWAC efforts. We can not predict where the skills of the men and women representing our agencies will next be needed, but can only hope that when that time comes they will find interagency communications capability not on their list of obstacles and barriers to be overcome. The Commission, in this proceeding, has an opportunity and an obligation to make that a reality.

Respectfully submitted,

John Wright, President  
California Public-Safety Radio Association

By:

A handwritten signature in black ink, appearing to read "Travis Williams", is written over a horizontal line.

Travis A. Williams, Chair  
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October 17, 1996